

I was very pleased to see the NAB proposal RM-1138, asking the FCC to allow AM broadcasters to operate FM translator stations as a “fill-in service” to retransmit their AM signals. I would like to take a moment to tell our stations’ story.

Our AM stations, as do the majority of AM radio stations, suffer tremendous interference issues. Our stations, WMBN Petoskey (1340 AM), Michigan and WATT Cadillac (1240 AM), Michigan are Class C stations – 1,000 watts day and night non-directional. Both stations suffer the typical decreased coverage and severe noise issues that plague this Class of AM stations. The WMBN day signal covers a radius of 20 miles with noise-free signal, and WATT covers about 17 miles. At night, WMBN covers 5 miles noise-free, while WATT has at least some noise nearly to the tower site itself, is difficult to hear in some parts of the city of license, and is unlistenable beyond 6 miles. This problem (as with most other stations of this class) affects how well we can effectively serve our audience.

WMKT Charlevoix (1270 AM) is the flagship of our AM group of stations, with 27,000 watts non-directional day and 5,000 watts 3-tower directional nights. While that sounds like a sizeable signal, it also has severe issues both at night and during the day due to sky wave. Before February of 2006, WMKT operated days at 5,000 watts non-directional. Oftentimes the station at 5,000 watts could not be heard 15 miles away from the tower, in Petoskey, Michigan where our studios are located. The signal of co-channel 50,000 watt WXYT Detroit (which is directional, pointed to the northeast away from us) totally overwhelmed the vast majority of our signal with daytime sky wave, completely drowning out our signal. On many days, the WMKT day signal was not listenable just outside the city of license.

Even now, with the increase to 27,000 watts, the signal does not perform as one would expect from such a station, especially during critical hours. The night pattern can only be heard within a few miles of Charlevoix and is unlistenable barely beyond our city of license. WMKT’s night pattern cannot be measured at night after 14 db (just a few miles away from the tower site) due to the severe interference from WXYT Detroit’s nighttime sky wave (Again, WXYT is directional, protecting WMKT night and day). This heavy interference effectively makes WMKT’s nighttime signal no better than the most extremely low power AM stations in the country.

In reading the comments on the NAB petition, I notice several posting mention many or all Class B stations don’t need a translator. I want to ask the Commission not to make a blanket rule against such stations receiving such relief. While I agree many class B station have decent power and coverage at night, WMKT does not. I invite you to come and listen to our night pattern. After hearing our massive night time interference situation on WMKT, I am sure you would agree this station needs relief as well every bit as much as our Class C stations. I am sure if we have this

level of interference issues to our night signal, there are other Class B stations needing help as well.

We have discussed several options with consultant engineers: to move the night site of WMKT, to raise power, or to change the night pattern, all to no avail due to the overlap issues. As you can see from these facts, the NAB proposal would help all of our AM stations better serve the communities they cover. FM translators would make a tremendous difference in our night service to the audiences of all three of our stations.

Referring to the comments left earlier by Larry Langford, I also think the Translators in discussion should not be auctioned in any fashion. This proposal is being presented with the idea of helping struggling AM radio stations. Auctioning to the highest bidder would price many of the small owners out of the very assistance meant to benefit them.

Thank you for taking time to learn our story. I urge you to allow FM Translators for AM radio broadcast stations fill-in service.